

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	Via ECF
JOFFRE M. MATTERA,	:	
	:	08 CIV 4040 (RJH)
Plaintiff,	:	
	:	
-against-	:	
	:	DEFENDANTS' RULE
JP MORGAN CHASE CORP., and JOHN F.,	:	26 DISCLOSURE
O'NEILL, JR (in his Official and Individual capacities	:	<u>STATEMENT</u>
pursuant to NYEL §§ 290 <i>et seq.</i>),	:	
	:	
Defendants.	:	
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JPMorgan Chase Bank, N.A. (erroneously sued herein as Defendant "JP Morgan Chase Corp.") ("JPMorgan Chase") and Defendant John F. O'Neill, Jr. (collectively, "Defendants"), by their attorneys, the JPMorgan Chase Legal & Compliance Department, Stacey L. Blecher, Assistant General Counsel, as and for their disclosure pursuant to Fed. R. Civ. P. 26, asserts as follows:

A. The name and, if known, the address and telephone number of each individual other than Plaintiff likely to have discoverable information that the disclosing party may use to support its claims or defenses:

<u>Name</u>	<u>Address</u>
John F. O'Neill, Jr.	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-3814
Robin L. Yudkoff	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-3814

Carol Lai	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-3814
Alice M. Stack	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-3814
Merrill Winter	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-3814
Michael J. Moran	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-3814
Muhammad Khalid	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-3814
Sally Weingierski	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-3814
Ellen Zicchino	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-3814
Michael J. Rosenberg	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-3814
Kerry K. Freeman	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-3814

The above-named individuals are likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase during some or all of the relevant time period, the employment, performance and job responsibilities of other persons under the same management and supervision of Plaintiff during some or all of the relevant time period, of various events referred to in Plaintiff's Complaint, and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

B. Documents, data compilations, and tangible things that the disclosing party may use to support its claims and defenses:

- Plaintiff's employee records file, if any;
- Plaintiff's AccessHR file, if any;
- Relevant documents and/or files, if any, maintained by JPMorgan Chase's Human Resources Department concerning Plaintiff;
- Relevant documents and/or files, if any, maintained by JPMorgan Chase's Treasury Services department concerning Plaintiff;
- Relevant documents and/or files, if any, maintained by any individual JPMorgan Chase manager or supervisor regarding Plaintiff;
- Relevant documents and/or files, if any, maintained by JPMorgan Chase's Employee Relations Department concerning Plaintiff;
- Relevant JPMorgan Chase policies, plans, and programs; and
- Relevant documentary communications, if any, whether in letter, memorandum, email, or other format.

C. The provisions of Fed. R. Civ. P. 26(a)(1)(C) are not applicable because Defendants are not seeking damages at this time from Plaintiff.

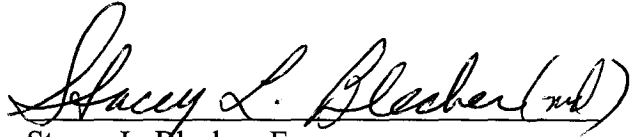
D. Defendants are investigating what, if any, insurance agreements may apply to Plaintiff's claims and will supplement its response as appropriate.

RESERVATION OF RIGHTS

Defendants reserve their rights to supplement and/or amend its Rule 26 Disclosure Statement if and when they deem it appropriate.

Dated: New York, New York
August 4, 2008

JPMorgan Chase Legal & Compliance Department

By: 
Stacey L. Blecher, Esq.

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